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March 30, 2023

Via ECF

The Honorable Cathy L. Waldor, U.S.M.J.
Martin Luther King Building & U.S. Courthouse
Courtroom: MLK 4D
50 Walnut Street
Newark, NJ 07102

Re: *Holly Ringling v. BetMGM, LLC*
Civil Action No. 22-7462-JXN-CLW

Shen Bei v. Bet MGM, LLC
Civil Action No. 23-328-JXN-CLW

Meredith Murphy and Scott Madlinger v. BetMGM, LLC
Civil Action No. 23-360-JXN-CLW

Anthony Grippa v. BetMGM, LLC
Civil Action No. 23-468-JXN-CLW

Dear Judge Waldor:

We are counsel for Plaintiff Holly Ringling in the first of the above-referenced matters. On behalf of all parties in the above-referenced matters, we submit for Your Honor's approval and entry a Stipulation and proposed Order providing for the Consolidation of these matters and deadlines for filings of the Consolidated Complaint and BetMGM's response to the Consolidated Complaint.

Thank you for your continued attention to this matter. Of course, if Your Honor has any questions, we are available at your convenience.

Respectfully submitted,

THE DANN LAW FIRM

/s/ Javier L. Merino
Javier L. Merino, Esq.

March 30, 2023

Page 2

Enclosure

Cc: All Counsel of Record (via ECF and email)

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

HOLLY RINGLING on behalf of herself and all
others similarly situated,

Plaintiff,

v.

BETMGM, LLC

Defendant.

SHEN BEI, individually and on behalf of all
others similarly situated

Plaintiff,

v.

BET MGM, LLC

Defendant.

MEREDITH MURPHY and SCOTT
MADLINGER, on behalf of themselves and a
class of all others similarly situated

Plaintiff,

v.

BETMGM, LLC

Defendant.

ANTHONY GRIPPA, individually and on behalf
of all others similarly situated

Plaintiff,

v.

BETMGM, LLC

Defendant.

Civil Action No. 22-7462 (JXN)(CLW)

**STIPULATION and [PROPOSED]
ORDER CONSOLIDATING RELATED
ACTIONS**

Civil Action No. 23-328(JXN)(CLW)

Civil Action No. 23-360(JXN)(CLW)

Civil Action No. 23-468(JXN)(CLW)

Plaintiffs Holly Ringling, Shen Bei, Meredith Murphy, Scott Madlinger, and Anthony Grippa, on behalf of themselves and all others similarly situated (“Plaintiffs”), and Defendant BetMGM, LLC (“BetMGM”) hereby stipulate and agree as follows, subject to the Court’s approval:

1. All of the captioned matters are hereby consolidated for all purposes under Civil Action No. 22-7462 (JXN)(CLW) with the caption:

| |
|-----------------------------------------|
| IN RE: BETMGM DATA BREACH LITIGATION |
|-----------------------------------------|

Civil Action No. 22-7462 (JXN)(CLW)

2. On a going forward basis, all papers shall be filed in Civil Action No. 22-7462 (JXN)(CLW). If a paper relates to less than all of the above actions, the caption shall indicate to which action(s) the paper relates.

3. Any action subsequently filed, transferred or removed to this Court, which is related to the above-captioned matters pursuant to Local Civil Rule 40.1(c), shall be consolidated for all purposes if and when they are drawn to the Court’s attention, into this consolidated action.

4. Plaintiffs shall file their Consolidated Complaint on or before April 21, 2023. No further amendment to the Consolidated Complaint shall be filed absent leave of Court or the agreement of the parties.

5. In light of the forthcoming Consolidated Complaint, BetMGM shall not be required to respond to the complaints filed in the above-captioned matters.

6. BetMGM shall file its response to the Consolidated Complaint on or before May 26, 2023.

7. The foregoing is without prejudice to any claims by Plaintiffs or any defenses on behalf of BetMGM.

STIPULATED and AGREED to this 30th day of March, 2023

/s/ Javier Luis Merino

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IT IS SO ORDERED, this _____ day of March, 2023

CATHY L. WALDOR, U.S.M.J.